

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

BURLHOLME CONGREGATION OF
JEHOVAH’S WITNESSES, et. al.,

Plaintiffs,

v.

MARK O’DONNELL.

Defendants.

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: Case No: 2:24-cv-0304-MRP
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: JURY TRIAL DEMANDED
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DEFENDANT’S MOTION FOR PROTECTIVE ORDER

Defendant Mark O’Donnell, through counsel, respectfully moves the Court for entry of a protective order to protect his right to keep his journalistic sources confidential. Mr. O’Donnell relies upon the Brief and Declaration submitted herewith in support of this motion.

WHEREFORE, for the foregoing reasons, Defendant Mark O’Donnell respectfully requests that the Court grant the Motion. A proposed form of Order is submitted herewith.

Respectfully submitted,

Dated: April 4, 2025

/s/Mary Catherine Roper
Mary Catherine Roper
John Grogan
LANGER, GROGAN & DIVER P.C.
1717 Arch St., Ste 4020
Philadelphia, PA 19103
Tel: (215) 320-5660
Fax: (215) 320-5703
mroper@langergrogan.com,

Counsel for Defendant